

Exhibit AN

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MIDDLESEX COUNTY
DOCKET NO. MID-L-003809-18AS

KAYME A. CLARK and
DUSTIN W. CLARK,

Plaintiffs,

v.

JOHNSON & JOHNSON, et al.,
Defendants.

VIRTUAL
DEPOSITION UPON
ORAL EXAMINATION
OF
WILLIAM E. LONGO
Ph.D.
(VOLUME II)

TRANSCRIPT of the stenographic notes
of ANDREA F. NOCKS, a Certified Court Reporter and
Certified Realtime Court Reporter of the State of
New Jersey, Certificate No. XI01573, taken virtually
on April 2, 2024, commencing at 11:18 a.m., Eastern
Standard Time.

Job No. 6625014

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<p style="text-align: right;">Page 240</p> <p>1 understand what you're telling us.</p> <p>2 CROSS-EXAMINATION BY MR. BRALY:</p> <p>3 Q. Bill, I just wanted to cover just a</p> <p>4 couple of things with you for a minute if we can.</p> <p>5 As a part of what was disclosed in</p> <p>6 this case that included your affidavit from the</p> <p>7 Tippin case, your affidavit from the declaration</p> <p>8 that you signed from September 25 of 2023, and</p> <p>9 several other charts, declarations and statements</p> <p>10 that I'm not going to ask you about in any kind of</p> <p>11 detail, but I do want to make it clear that you've</p> <p>12 tested many different products originating from</p> <p>13 mine-sourced locations that are consistent with the</p> <p>14 years of the mine sources associated with Johnson &</p> <p>15 Johnson's products for particular years.</p> <p>16 Is that fair?</p> <p>17 MR. HYNES: Object to form; leading.</p> <p>18 BY MR. BRALY:</p> <p>19 Q. I'm sorry, Bill. Will you just</p> <p>20 repeat your answer?</p> <p>21 A. That is correct. That's true.</p> <p>22 Q. Okay. And I just want to make it</p> <p>23 clear on the record that that was also part of what</p> <p>24 was disclosed, as part of the foundation and</p> <p>25 reliance on what you may be asked about at trial,</p>	<p style="text-align: right;">Page 242</p> <p>1 February 24 of 2023.</p> <p>2 A. You mean this one?</p> <p>3 Q. No, not that one. I'll just put it</p> <p>4 on the screen.</p> <p>5 A. Okay.</p> <p>6 Q. Whatever the next exhibit is. This</p> <p>7 was a chart that was used in the plant in South</p> <p>8 Carolina.</p> <p>9 A. Okay.</p> <p>10 Q. This was part of the material that</p> <p>11 was produced for your reliance materials and --</p> <p>12 A. I know those charts, I mean,</p> <p>13 obviously.</p> <p>14 Q. So, for example, the section that</p> <p>15 says "talc from China" here at the bottom, and it</p> <p>16 lists out various sources of testing, including</p> <p>17 testing, for example, in this first entry of</p> <p>18 Chanel's products.</p> <p>19 A. Correct.</p> <p>20 Q. That's all I'm getting across to you.</p> <p>21 A. Okay.</p> <p>22 Q. Is that some of the knowledge that</p> <p>23 you have about your certainty of the presence of</p> <p>24 asbestos in certain Johnson & Johnson products does</p> <p>25 come from testing of other manufacturers' products</p>
<p style="text-align: right;">Page 241</p> <p>1 relevant to how you know that certain vintages and</p> <p>2 years of Johnson & Johnson products contain</p> <p>3 asbestos, in addition to your direct observation of</p> <p>4 Johnson & Johnson specific products; fair?</p> <p>5 MR. HYNES: Objection.</p> <p>6 A. Well, it's fair. I mean, they're</p> <p>7 documentation.</p> <p>8 For example, the Hammondsville mine</p> <p>9 and the Argonaut mine, they developed a pilot plant</p> <p>10 to figure out if they could remove the asbestos</p> <p>11 using different surfactants, and, you know, they</p> <p>12 spiked the sample and then they compared it to the</p> <p>13 others. And the surfactants somewhat worked for the</p> <p>14 tremolite, anthophyllite, chrysotile, but couldn't</p> <p>15 remove it all; it would reduce the concentration.</p> <p>16 Now, if there's actually no asbestos</p> <p>17 in any of these mines, why would J&J be spending all</p> <p>18 that money to try to remove something that didn't</p> <p>19 exist?</p> <p>20 MR. HYNES: Move to strike the</p> <p>21 nonresponsive portion.</p> <p>22 BY MR. BRALY:</p> <p>23 Q. For example, and I could show this if</p> <p>24 you don't recall it, but there was a chart that was</p> <p>25 produced that's referred to as the -- it's from</p>	<p style="text-align: right;">Page 243</p> <p>1 using the same source material; fair?</p> <p>2 A. Fair.</p> <p>3 MR. HYNES: Object to form.</p> <p>4 BY MR. BRALY:</p> <p>5 Q. Okay. That's all I wanted to</p> <p>6 establish. I'll hold on to the rest of the</p> <p>7 questions till I have you at trial. Thank you,</p> <p>8 Dr. Longo.</p> <p>9 A. Thank you.</p> <p>10 THE WITNESS: And, Kevin, I</p> <p>11 appreciate your professionalism, meaning you don't</p> <p>12 take this personally, I don't either, and you're</p> <p>13 not, you know, trying to mimic, or hopefully nobody</p> <p>14 does, somebody like Robert Thackston, who can be</p> <p>15 very personal and aggressive. So I appreciate your</p> <p>16 professionalism.</p> <p>17 MR. HYNES: I think we're ready to go</p> <p>18 off the record. And thanks again for your time</p> <p>19 today, Dr. Longo.</p> <p>20 THE WITNESS: Thanks, guys.</p> <p>21 (Deposition adjourns: 2:09 p.m.,</p> <p>22 Eastern Standard Time.)</p> <p>23</p> <p>24</p> <p>25</p>

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1 CERTIFICATE OF OFFICER

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I CERTIFY that the foregoing is a true
and accurate transcript of the testimony and
proceedings as reported stenographically by me at
the time, place and on the date as hereinbefore set
forth.

I DO FURTHER CERTIFY that I am neither
a relative nor employee nor attorney or counsel of
any of the parties to this action, and that I am
neither a relative nor employee of such attorney or
counsel, and that I am not financially interested in
the action.



ANDREA NOCKS, CCR, CRR
Certificate No. X100157300
Certificate No. XR00011300

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